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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
DEBRA EDISON,)
)
Defendant.)

Criminal No. CR 07-0479 WHA

**STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on February 20, 2008. The defendant was represented by Eric Hairston, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. The matter was set before this Court for hearing on the defendant's motion to suppress evidence on April 8, 2008.

The Court made a finding that the time from and including February 20, 2008, through and including March 18, 2008 (the date for filing of the defense motion to suppress evidence), should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), because the ends of

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1 justice served by taking such action outweighed the best interest of the public and the defendant
2 in a speedy trial. The finding was based on the need for the defendant to have reasonable time
3 necessary for effective preparation, taking into account the fact that, among others, the matter is
4 related to the U.S. v. Michael Edison case and exercise of due diligence, and for continuity of
5 counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

6 The parties hereby agree to and request that the case be continued until April 8, 2008, and
7 that the exclusion of time until then be granted. The parties agree and stipulate that the
8 additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A),
9 because the ends of justice served by this continuance outweigh the best interest of the public and
10 the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively
11 prepare, taking into account the exercise of due diligence, and will provide for continuity of
12 counsel for the defendant.

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14
15 DATED: February 28, 2008

/s/

ERIC M. HAIRSTON
Counsel for Debra Edison

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17
18 DATED: February 28, 2008

/s/

JEFFREY R. FINIGAN
Assistant U.S. Attorney

19
20
21 So ordered.

22 DATED:

WILLIAM H. ALSUP
UNITED STATES DISTRICT COURT JUDGE